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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA THOMAS,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-00571-VCF

**UNOPPOSED MOTION FOR EXTENSION OF
TIME**

(FIRST REQUEST)

1 Defendant, the Acting Commissioner of Social Security, through the undersigned counsel, hereby
2 requests a 30-day extension of time to respond to Plaintiff's Motion for Reversal and/or Remand, which is
3 currently due on or before August 31, 2022. The new proposed deadline is September 30, 2022.

4 Good cause exists for this request because the undersigned attorney and Defendant's counsel of
5 record has resigned from the Office of the General Counsel for the Social Security Administration, and is
6 currently transitioning her matters to other attorneys. Additional time is required so that the new attorney
7 has time to review Plaintiff's motion and case file in order to determine whether this matter can be resolved
8 by settlement, or whether the Commissioner will respond by filing an answering brief. This request is
9 made in good faith and is not intended to delay the proceedings in this matter. Counsel apologizes to the
10 Court and Plaintiff's counsel for the inconvenience.

11 On August 3, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to
12 the requested extension.

13 It is therefore respectfully requested that Defendant be granted a 30-day extension of time to file a
14 response to Plaintiff's Motion for Reversal and/or Remand, through and including September 30, 2022.

15
16 Dated: August 4, 2022

JASON M. FRIERSON
United States Attorney

18 /s/ Allison J. Cheung
19 ALLISON J. CHEUNG
Special Assistant United States Attorney

20
21
22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 8-4-2022
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 4, 2022

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney